

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHRISTOPHER GERARD AHEE,

Plaintiff,

v.

PHILLIP LAUGHLIN, MICHAEL  
SABLONSKI, ALBERT ERANI, DONNA  
ABELLI LOPOLITO, JOHN J. ACARI,  
HERBERT M. STEIN, ALAN ADES,  
BERNARD A. MARDEN, ALAN W. TUCK,  
NOVARTIS PHARMA AG and PRICE-  
WATERHOUSE COOPERS, LLP,

Defendants.

C.A. No. 04-10517 JLT

BRUNO HOFFMAN, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

C.A. No. 04-10027 JLT

v.

PHILLIP LAUGHLIN, MICHAEL  
SABLONSKI, ALBERT ERANI, DONNA  
ABELLI LOPOLITO, JOHN J. ACARI,  
HERBERT M. STEIN, ALAN ADES,  
BERNARD A. MARDEN, ALAN W. TUCK,  
NOVARTIS PHARMA AG and PRICE  
WATER-HOUSE COOPERS, LLP,

Defendants.

**PLAINTIFF AHEE'S MOTION TO STRIKE DEFENDANT  
PRICEWATERHOUSECOOPERS LLP'S MOTION TO DISMISS**

Plaintiff Christopher Gerard Ahee ("Ahee") hereby moves this Court for an order striking the

Motion to Dismiss filed in *Ahee v. Laughlin, et al.*, C.A. No. 04-10517 JLT (the "Ahee Action")

by defendant Pricewaterhousecoopers, LLP ("PWC"). As reasons in support of this Motion to Strike, Ahee adopts and incorporates the arguments and points and authorities submitted by the Hoffman Group<sup>1</sup> in support of its motions to strike PWC's motions to dismiss in the *Ahee* Action and in *Hoffman v. Laughlin, et al.*, C.A. No. 04-10027 JLT.

Respectfully submitted,

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*Attorneys for Plaintiff  
Christopher Gerard Ahee*

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<sup>1</sup> Proposed lead plaintiffs Bruno Hoffman, John H. Bowie, Richard Madigan and Richard Conen.